

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **NORTHERN DISTRICT OF CALIFORNIA**

3       NICHOLAS KIS, on behalf of himself and  
4       all others similarly situated,

5                                   Plaintiff,

6                                   v.

7       COGNISM INC.,

8                                   Defendant.

CASE NO.: 4:22-cv-05322-JST

**SUPPLEMENTAL DECLARATION  
OF JAMES ISILAY**

9           I, James Isilay, hereby declare, pursuant to 28 U.S.C § 1746, as follows:

10          1.       I am the Founder and Chief Executive Officer of Cognism Ltd., the parent  
11       company of Defendant Cognism Inc. (“Cognism”).

12       **KASPR**

13          2.       Kaspr is not owned or operated by Defendant. It is a separate French company  
14       with its own operations.

15          3.       The Kaspr plug-in is not a product offered by Defendant.

16          4.       Users of Kaspr cannot access the Cognism platform, and users of the Cognism  
17       platform do not have access to Kaspr.

18       **INTENT DATA**

19          5.       Cognism does not track or monitor a user’s website behavior, other than standard  
20       “cookies” used to track a Cognism user’s behavior while navigating the Cognism website.

21          6.       Instead, Cognism purchases data from a third-party vendor that contains  
22       anonymized and not individualized browsing information.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3  
4 Executed in London, United Kingdom, on 2/16/2023.

5 DocuSigned by:

6 *James Isilay*

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8 JAMES ISILAY

9 CHIEF EXECUTIVE OFFICER  
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